

FILED BY *MS* D.C.

05 OCT 27 PM 4:37

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

FILED BY *ISA* D.C.

05 OCT 12 PM 2:08

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

V

JACQUELINE PRADO

cause no. 2:03CR20415-02

MOTION GRANTED

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

Jon P. Pratt
JON PRATT
U.S. DISTRICT COURT

MOTION TO WITHDRAW

10-13-2005
DATE

Comes now counsel for the defendant, Jacqueline Prado, and states the following to wit:

1. That Jacqueline Prado has requested that I be removed as counsel of record.
2. That I am in agreement that I counsel herein can no longer serve as competent counsel in this matter.
3. That no breach of confidentiality has occurred nor has there been any lack of communication between the parties as is referenced by Exhibit 'A' showing the telephone calls made by Jacqueline Prado to counsel herein.
4. That it is in the best interest of all parties that Jacqueline Prado be allowed new counsel.

Dated: October 11, 2005

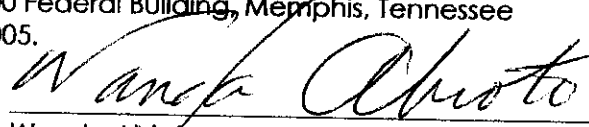
Wanda Abieto

Wanda Abieto
1555 Madison Avenue
Memphis, TN 38106
(901) 725-3719
MSB 8156

Certificate of Service

165

I, Wanda Abioto certify that I have mailed postage prepaid a true and correct copy of the foregoing to Hon. David Henry, 800 Federal Building, Memphis, Tennessee 38103 on this the 11th day of October, 2005.


Wanda Abioto

CORRECTIONAL
BILLING
SERVICES

Page 13 of 15

ABIOTO LAW CENTER, PLLC
 Account Number: 901 725-3719 359 1876
 Monthly Statement Date: July 2, 2005

**Detailed
Statement of
Charges**

Itemized Calls

901 725-3719

Service Provider - EVERCOM SYSTEMS, INC.

To contact the Service Provider directly, call 1 800 844-6591

Collect Calls

Date	Called From	Number	Rate*	Time	Min	Amount
1. 06/27	MASON TN	901 294-3104	HDS	02:28PM	1	1.00
2. 06/27	MASON TN	901 294-3104	HDS	03:52PM	4	1.00
3. 06/29	MASON TN	901 294-3104	HDS	04:03PM	1	1.00
4. 06/29	MASON TN	901 294-3104	HDS	04:20PM	4	1.00
Total Collect Calls						4.00

Total Charges for 901 725-3719 4.00

The above total does not include the following taxes:

Federal Excise Tax	\$0.12
TN - State/Local Tax	\$0.38
Total Itemized Calls	4.00

Taxes

5. Federal Excise Tax	.12
6. TN - State/Local Tax	.38
Total Taxes	.50

Total Correctional Billing Services Current Charges 4.50

* Taxes and Rate Codes - Page 15

This portion of your bill is provided as a service to Correctional Billing Services.



ABIOTO LAW CENTER, PLLC
 Account Number: 901 725-3719 359 1876
 Monthly Statement Date: September 2, 2005

**Detailed
 Statement of
 Charges**

For Correctional
 Billing Services
 Billing Questions,
 Call 1 800 844-6591

Itemized Calls
 901 725-3719

Service Provider - EVERCOM SYSTEMS, INC.

To contact the Service Provider directly, call 1 800 844-6591

Collect Calls

<u>Date</u>	<u>Called From</u>	<u>Number</u>	<u>Rate*</u>	<u>Time</u>	<u>Min</u>	<u>Amount</u>
1. 08/02	MASON TN	901 294-3104	HDS	04:47PM	19	1.00
2. 08/16	MASON TN	901 294-3104	HDS	04:55PM	3	1.00
3. 08/19	MASON TN	901 294-3104	HDS	04:12PM	6	1.00
4. 08/19	MASON TN	901 294-3104	HDS	04:19PM	2	1.00
5. 08/24	MASON TN	901 294-3104	HDS	02:39PM	4	1.00
6. 09/01	MASON TN	901 294-3104	HDS	03:55PM	3	1.00
Total Collect Calls						6.00

Total Charges for 901 725-3719 6.00

The above total does not include the following taxes:

Federal Excise Tax	\$0.18
TN - State/Local Tax	\$0.57
Total Itemized Calls	6.00

Taxes

7. Federal Excise Tax18
8. TN - State/Local Tax57
Total Taxes75

Total Correctional Billing Services Current Charges 6.75

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TENNESSEE

167 NORTH MAIN STREET

MEMPHIS, TENNESSEE 38103

JON PHIPPS McCALLA

JUDGE

901 495-1291

901 495-1295 (FAX)

Jon_McCalla@tnwd.uscourts.gov

September 23, 2005

Wanda Abioto
LAW OFFICE OF WANDA ABIOTO
1555 Madison Ave.
Memphis, TN 38104

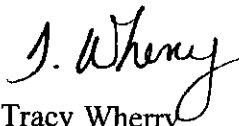
Re: USA v. Jacqueline Prado, 03-20415 MI

Dear Counsel:

Enclosed is a copy of a letter to Judge McCalla from your client Jacqueline Prado received on September 20, 2005, requesting new counsel.

Your attention to this matter is appreciated.

Sincerely,



Tracy Wherry
Assistant to Judge Jon McCalla

Encl

cc: AUSA David Henry (w/enclosure)

9-19-05

Honorable Jan Phipps McCalla
 United States District Judge
 Court Room 4 9th Floor
 Federal Building Memphis, TN
 38103

SEP 20 2005

03-20415

Judge McCalla

I'm Writing this letter With Concerns about my representation of Counsel. I feel My rights has been Violated. All of my request has been ignored by My lawyer. I've been ignored when I asked for a suppression hearing and when I mentioned it to my lawyer again she said OK but nothing was ever done. I wasn't allowed a SKI plus my Counsel client Confidentiality was Violated. I trusted My lawyer to pull me in for a proffer and she told my Co-defendant's attorney of my plans. In which he pulled his client into Court to proffer me. She told his attorney I was going to sell him up the river. I believe the day in question was July 19th. On My ride back to West Tennessee my Co-defendant mention to me my decision to tell what I knew. He said he'd kill me if I did. I brought the Matter to my attorney's attention and she totally ignored the threat. Everytime I call her she's unavailable. She's only been to see me once and that was before I hired her. She's never gone Over my discovery With me. She's promised me a bond and time served during the Consultation With her. I've mention physical abuse to her from Mr. Torres and she said she felt I shouldn't do another day in jail but I'm still here. When I told her my Co-defendant had pleaded out. She said she knew and I was extremely upset because Mr. Torres was allowed to die and keep me locked up. How can I trust someone With my

life who's lied to me numerous times. It like
 my life is a joke to her and it's unfair.
 Also my family is truly concern with the type
 of business Mrs. Abioto is running she's never
 available, never answers her line. I feel my case
 hasn't been handled properly and I haven't been
 treated fairly, Nor given a fair chance. Sir, I
 can't possibly be sentenced under these circumstances.
 I've only seen Mrs. Abioto during court and our
 conversation was limited. Sir I know I deserve to
 be punished but not for 9 years. I've gone through
 alot in 2 years. I've learned alot and I've seen alot,
 and Sir this is a lesson learn. But to be with my
 kids again I'd do whatever, 15-20 years of supervised
 release, ankle bracelet or whatever. I'll die without
 my children. Your Honor my attorney violated our
 breach of trust, displayed with my life, I'm
 begging your Sir not to sentence me under
 the circumstances. Sir I'm asking for a new
 lawyer.

Thank you
 Mrs. Jacqueline Prado



Notice of Distribution

This notice confirms a copy of the document docketed as number 165 in case 2:03-CR-20415 was distributed by fax, mail, or direct printing on October 28, 2005 to the parties listed.

David Charles Henry
U.S. ATTORNEY'S OFFICE
167 N. Main St.
Ste. 800
Memphis, TN 38103

Wanda Abioto
LAW OFFICE OF WANDA ABIOTO
1555 Madison Ave.
Memphis, TN 38104

Honorable Jon McCalla
US DISTRICT COURT